

IN CLERK'S OFFICE  
US DISTRICT COURT E.D.N.Y.  
\* OCTOBER 3, 2023 \*  
BROOKLYN OFFICE

JMH:SMS  
F. #2023R00688

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

- against -

FRANCO ALEXANDER  
PERAZA NAVAS,

Defendant.

----- X  
THE GRAND JURY CHARGES:

I N D I C T M E N T

Cr. No. 23-CR-396  
(T. 18, U.S.C., §§ 924(d)(1),  
981(a)(1)(C), 982(a)(5), 982(b)(1),  
1951(a), 2119, 2119(1), 2 and 3551  
et seq.; T. 21, U.S.C., § 853(p); T. 28,  
U.S.C., § 2461(c))

Judge Margo K. Brodie  
Magistrate Judge Lois Bloom

COUNT ONE  
(Carjacking – John Doe #1)

1. On or about August 30, 2023, within the Eastern District of New York and elsewhere, the defendant FRANCO ALEXANDER PERAZA NAVAS, together with others, with intent to cause death and serious bodily harm, did knowingly and intentionally take a motor vehicle that had been transported, shipped and received in interstate and foreign commerce from the person and presence of another, to wit: John Doe #1, an individual whose identity is known to the Grand Jury, by force and violence and by intimidation, and attempt to do so.

(Title 18, United States Code, Sections 2119, 2119(1), 2 and 3551 et seq.)

COUNT TWO  
(Hobbs Act Robbery)

2. On or about September 8, 2023, within the Eastern District of New York and elsewhere, the defendant FRANCO ALEXANDER PERAZA NAVAS, together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of United States currency from a commercial establishment located on Sheepshead Bay Road in Brooklyn, New York, the identity of which is known to the Grand Jury.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

COUNT THREE  
(Carjacking – John Doe #2)

3. On or about September 9, 2023, within the Eastern District of New York and elsewhere, the defendant FRANCO ALEXANDER PERAZA NAVAS, together with others, with intent to cause death and serious bodily harm, did knowingly and intentionally take a motor vehicle that had been transported, shipped and received in interstate and foreign commerce from the person and presence of another, to wit: John Doe #2, an individual whose identity is known to the Grand Jury, by force and violence and by intimidation, and attempt to do so.

(Title 18, United States Code, Sections 2119, 2119(1), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNTS ONE AND THREE

4. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged in Counts One and Three, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 982(a)(5), which requires any person convicted of such offenses to forfeit any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of such offenses; and (b) Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of any criminal law of the United States.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other

property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 924(d)(1), 982(a)(5) and 982(b)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNT TWO

6. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of such offense; and/or (b) Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any violation of any criminal law of the United States.

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 924(d)(1) and 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

  
FOREPERSON

*By Carolyn Pokorny, Assistant U.S. Attorney*

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BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK



F.#: 2023R00688  
FORM DBD-34  
JUN. 85

No. \_\_\_\_\_

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UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

---

THE UNITED STATES OF AMERICA

vs.

FRANCO ALEXANDER PERAZA NAVAS,

Defendant.

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INDICTMENT

(T. 18, U.S.C., §§ 924(d)(1), 981(a)(1)(C), 982(a)(5), 982(b)(1), 1951(a),  
2119, 2119(1), 2 and 3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C.,  
§ 2461(c))

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*A true bill.*

*Mary Beth Gleadman* \_\_\_\_\_  
Foreperson

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Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
Clerk

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Bail, \$ \_\_\_\_\_

\_\_\_\_\_  
*Sean M. Sherman, Assistant U.S. Attorney (718) 254-6262*